

The Honorable Alfredo R. Perez  
Hearing date: December 5, 2024  
Hearing time: 9:00 a.m.  
Response date: November 27, 2024

United States Courts  
Southern District of Texas  
FILED

NOV 05 2024

UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

Nathan Ochsner, Clerk of Court

IN RE:

REFRESHING USA, LLC,

Debtor,

NO. 24-33924-ARP  
NO. 24-33919-ARP  
NO. 24-33934-ARP

Chapter 11

NOTICE OF HEARING ON MOTION FOR  
RELIEF FROM AUTOMATIC STAY OR  
ALTERNATIVELY MOTION FOR AN  
ORDER DETERMINING THAT THE STAY  
IS NOT IN EFFECT

TO: The Clerk of the Above-Entitled Court  
AND TO: All creditors and parties in interest

PLEASE TAKE NOTICE that Herald Holdings, LLC, a Washington limited liability company ("Herald"), unsecured creditor and lessor to VendPro, LLC, (hereafter, "VendPro"), a Washington limited liability company, in the above-captioned Chapter 11 case, has filed a Motion for entry of an Order lifting the automatic stay pursuant to 11 U.S.C. § 362(d)(1) or alternatively ordering that the stay is not in effect as between Herald and Refreshing USA, LLC or Water Station Management, LLC (the "Motion"), which have been SET FOR HEARING as follows:

JUDGE: Alfredo R. Perez

TIME: 9:00 a.m.

PLACE: 515 Rusk,  
Courtroom 400,  
Houston, TX 77002

DATE: December 5, 2024

1 IF YOU OPPOSE the Motion, you must file your written response with the Clerk's office  
2 of the bankruptcy court and deliver copies to the undersigned and to all parties in interest NO  
3 LATER THAN THE RESPONSE DATE, which is **NOVEMBER 27, 2024**. If you file a  
4 response, you are also required to appear at the hearing.

5 IF NO RESPONSE IS TIMELY FILED AND SERVED, THE COURT MAY, IN ITS  
6 DISCRETION, GRANT THE MOTION PRIOR TO THE HEARING WITHOUT FURTHER  
7 NOTICE AND STRIKE THE HEARING.

8 If you wish to receive a copy of the Motion and proposed order, you may contact the  
9 undersigned by telephone or contact Paralegal Anna Sier at (206) 224-8105 or  
10 asier@karrtuttle.com.

11 DATED this 30<sup>th</sup> day of October, 2024  
12  
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14 /s/ Steven M. Palmer  
15 Steven M. Palmer, *Pro Hac Vice*  
16 KARR TUTTLE CAMPBELL  
17 701 Fifth Ave, Suite 3300  
18 Seattle, WA 98109  
19 Phone: (206) 223-1313  
20 E-mail: spalmer@karrtuttle.com  
21 Attorneys for Herald Holdings, LLC  
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1 **CERTIFICATE OF SERVICE**

2 I, Annaliese K. Sier, affirm and state that I am employed by Karr Tuttle Campbell in  
3 King County, in the State of Washington. I am over the age of 18 and not a party to the within  
4 action. My business address is: 701 Fifth Avenue, Suite 3300, Seattle, Washington 98104. On  
5 this day, I caused to be filed with the Court a true and correct copy of the foregoing document  
6 via the Court's electronic filing system, which caused service of the document to all parties  
7 registered to receive notifications through CM/ECF.

8 I also caused to be mailed via U.S. mail true and correct copies of the foregoing to all  
9 entities listed on the Court's Mailing Matrix as of the date below.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 DATED this 30<sup>th</sup> day of October, 2024, at Seattle, Washington.

12 s/ Annaliese K. Sier  
13 Annaliese K. Sier  
14 Paralegal  
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